

# **EXHIBIT 7**

**IN THE DISTRICT COURT OF OKFUSKEE COUNTY  
STATE OF OKLAHOMA**

**GREAT PLAINS NATIONAL BANK, a  
national banking association,**

**Plaintiff,**

**v.**

**CM HEAVY MACHINERY, LLC and  
CLINT MICHAEL MEADORS,**

**Defendants,**

**AND**

**INTERNAL REVENUE SERVICE,  
OKLAHOMA TAX COMMISSION,  
OKFUSKEE COUNTY, OKLAHOMA, by  
and through THE BOARD OF COUNTY  
COMMISSIONERS OF OKFUSKEE  
COUNTY and THE OKFUSKEE COUNTY  
TREASURER,**

**Additional Defendants.**

Case No. CJ-24-34

**FILED**  
IN DISTRICT COURT  
OKFUSKEE COUNTY, OKLA.

JUN 06 2024

SHERRI L. FOREMAN, COURT CLERK  
BY \_\_\_\_\_ DEPUTY

**APPLICATION FOR TEMPORARY RESTRAINING ORDER, WRIT OF REPLEVIN,  
AND TEMPORARY INJUNCTIVE RELIEF**

Plaintiff Great Plains National Bank ("Plaintiff"), pursuant to 12 O.S. § 1384.1 and 12 O.S. § 1571, requests the Court issue (1) a temporary restraining order for such period of time until the Court may afford the parties a hearing; (2) replevin of the "Business Property" (as defined in *Plaintiff's Verified Petition*) currently in the possession, custody, or control of Defendants CM Heavy Machinery, LLC ("CM Heavy") and Clint Michael Meadors ("Mr. Meadors") (collectively, "Defendants"); and (3) a temporary injunction prohibiting and restraining transferring, damaging, concealing, or destroying the Business Property as defined in *Plaintiff's Verified Petition* filed herein. In support of this Application, Plaintiff represents as follows:

1. Plaintiff hereby incorporates in this paragraph, as if fully set forth herein, the allegations set forth in *Plaintiff's Verified Petition*.

2. Pending the hearing on Plaintiff's Application for Writ of Replevin and Temporary Injunctive Relief, or such earlier hearing date as the Court may set in respect of the instant Application for Temporary Restraining Order, Plaintiff is entitled to the issuance of a restraining order sought hereby without notice.

3. Defendant CM Heavy's operation of its business and Defendants' depletion of the Business Property throughout the pendency of this action will materially impair the Business Property. Such depletion of the Business Property would render a future judgment to turn over the Business Property to Plaintiff ineffectual.

4. Defendants are wrongfully withholding the Business Property through intentional and wrongful acts as reflected in *Plaintiff's Verified Petition* filed herein, without any basis or authority.

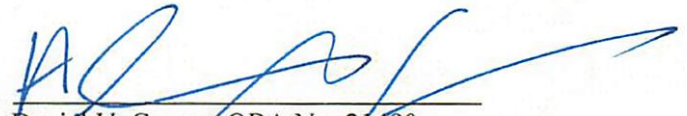
5. Plaintiff is entitled to immediate possession of the Business Property as defined in *Plaintiff's Verified Petition*, as Defendants are wrongfully in possession of said Business Property.

6. No harm is anticipated to Defendants by the issuance of the Temporary Restraining Order sought hereby, as Plaintiff is a rightful secured interest holder and claimant of Defendants' assets, which include but are not limited to the Business Property (as defined in *Plaintiff's Verified Petition*), and it is thus submitted that no further security be required by the Plaintiff as a condition of issuance.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff requests: (1) a Temporary Restraining Order be issued forthwith and without notice, restraining Defendants CM Heavy and Mr. Meadors, as well as their respective employees, representatives, agents or servants, and all

persons acting on their behalf or by or under their authority, from transferring, damaging, concealing, destroying, or otherwise disposing of the Business Assets (as defined in *Plaintiff's Verified Petition*); (2) upon hearing set for a later date, the Court issue an Order of Delivery ordering Defendants to deliver all of the Business Property (as defined in *Plaintiff's Verified Petition*) in their possession, custody, and control for the immediate delivery to GPNB or, alternatively, the Temporary Restraining Order entered by the Court in this matter be converted to a Temporary Injunction with the same terms and conditions; (3) the Court grant Plaintiff all reasonable attorney's fees and costs relating to the matters stated herein; and (4) such Court-ordered Temporary Injunction shall remain in effect until further order of the Court or trial on the merits.

Respectfully submitted,



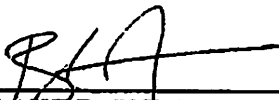
Daniel V. Carsey, OBA No. 24490  
Alexandra A. Crawley, OBA No. 34634  
**HALL, ESTILL, HARDWICK, GABLE,  
GOLDEN & NELSON, P.C.**  
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acrawley@hallestill.com

**ATTORNEYS FOR PLAINTIFF**


**VERIFICATION**

STATE OF OKLAHOMA            )  
  ) SS.  
COUNTY OF Oklahoma        )

Blake D. Johnson, being first duly sworn, upon oath, deposes and states that he is an authorized representative of Great Plains National Bank, and is responsible for overseeing the aforesaid account of Defendants CM Heavy Machinery, LLC, and Clint Michael Meadors and is familiar with the facts of this particular matter; that he has reviewed the allegations of the foregoing Application for Temporary Restraining Order and Temporary Injunction, and that the allegations set forth therein are true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
BLAKE D. JOHNSON

SUBSCRIBED AND SWORN TO before me this 5 day of June 2024.

  
\_\_\_\_\_  
NOTARY PUBLIC  
Commission No. \_\_\_\_\_

My commission expires:

\_\_\_\_\_  
[SEAL]

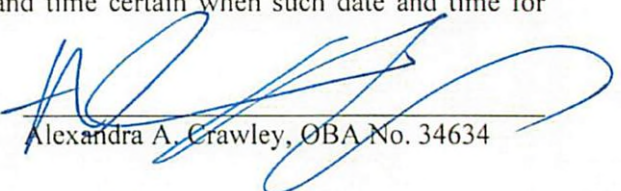


**CERTIFICATION BY COUNSEL**

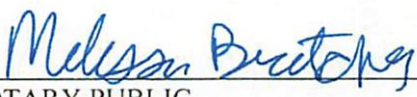
STATE OF OKLAHOMA                     )  
   ) ss.  
COUNTY OF OKLAHOMA                 )

I, Alexandra A. Crawley, of lawful age, being first duly sworn, upon oath state as follows:

1. Plaintiff is seeking emergency relief as contemplated by 12 O.S. § 1384.1.
2. Due to Defendants' evasion of service and lack of appearance in this case, Plaintiff and its undersigned counsel have no information on litigation counsel for Defendants CM Heavy Machinery, LLC, and Clint Michael Meadors.
3. Notice has not been provided to Defendants CM Heavy Machinery, LLC, and Clint Michael Meadors prior to the Application for Temporary Restraining Order. Plaintiff will notify Defendants CM Heavy Machinery, LLC, and Clint Michael Meadors of the relief sought by personal service of a true and correct copy of the Application for Temporary Injunction and Notice of Request for Order of Delivery, or as otherwise directed by the Court. Plaintiff will notify all Additional Defendants of the relief sought by mailing via certified mail a true and correct copy of the Application for Temporary Injunction and Notice of Request for Order of Delivery, or as otherwise directed by the Court.
4. All Defendants will also receive adequate notice of the presentation of the Application for Temporary Injunction at a date and time certain when such date and time for hearing is set by the Court.

  
\_\_\_\_\_  
Alexandra A. Crawley, OBA No. 34634

SUBSCRIBED AND SWORN TO before me this 5 day of June 2024.

  
\_\_\_\_\_  
NOTARY PUBLIC  
Commission No. 22006728

My commission expires:

5/12/2026  
[SEAL]

